

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

**CERTIFICATION OF CPNI FILING FEBRUARY 6, 2006  
OF CENTENNIAL PUERTO RICO OPERATIONS CORP.  
D/B/A CENTENNIAL BUSINESS SOLUTIONS**

**EB-06-TC-060 / WC DOCKET NO. 06-36**

Pursuant to the recent Public Notice<sup>1</sup> issued by the Enforcement Bureau asking all telecommunications carriers to file with the Commission by February 6, 2006 the customer proprietary network information ("CPNI") compliance certificates required under section 64.2009(e) of the Commission's rules, Centennial Puerto Rico Operations Corp. d/b/a/ Centennial Business Solutions hereby submits the following certificate and statement.<sup>2</sup>

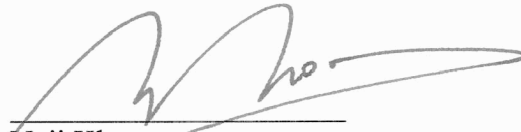
I, Naji Khoury, Vice President of Product and Business Development, Centennial Puerto Rico Operations Corp. d/b/a/ Centennial Business Solutions hereby certify that I have personal knowledge that Centennial Puerto Rico Operations Corp. d/b/a/ Centennial Business Solutions has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules, found at 47 C.F.R. Pt. 64, Subpt. U. Attached to this certificate is a statement explaining how the operating procedures of Centennial Puerto Rico Operations Corp. d/b/a/ Centennial Business Solutions ensure

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<sup>1</sup> Enforcement Bureau Directs All Telecommunications Carriers to Submit CPNI Compliance Certifications, Public Notice, DA 06-223 (EB rel. Jan. 30, 2006); *see also* Enforcement Bureau Opens New Docket for the February 6, 2006, Filing of CPNI Compliance Certifications (EB Docket No. 06-36), Public Notice, DA 06-258 (EB rel. Feb. 2, 2006).

<sup>2</sup> Centennial Puerto Rico Operations Corp. d/b/a/ Centennial Business Solutions provides broadband services in Puerto Rico. Centennial Puerto Rico Operations Corp. also provides commercial mobile radio services ("CMRS") in Puerto Rico, but under a different "doing business as" name: "Centennial de Puerto Rico." Centennial Puerto Rico Operations Corp. d/b/a/ Centennial de Puerto Rico is filing, concurrently with this certification, a CPNI certification for its CMRS business.

that it is in compliance with the Commission's CPNI rules.

A handwritten signature in black ink, appearing to read 'Naji Khoury', written over a horizontal line.

Naji Khoury  
Vice President of Product and Business Development  
Centennial Puerto Rico Operations Corp. d/b/a Centennial  
Business Solutions

**STATEMENT CONCERNING PROCEDURES ENSURING  
COMPLIANCE WITH CPNI REGULATIONS**

The operating procedures and practices of Centennial Puerto Rico Operations Corp. d/b/a/ Centennial Business Solutions (“Centennial Business Solutions”) ensure that Centennial Business Solutions complies with the Commission’s rules at 47 C.F.R. § 64.2001, *et. seq.*, governing the use of customer proprietary network information (“CPNI”). Compliance with such rules is demonstrated by the policies and practices employed by Centennial Business Solutions, a brief explanation of which is provided below.

First, Centennial Business Solutions only provides one category of services to its customers—broadband services to medium- and large-sized businesses—and it does not use any CPNI in the marketing of its services because each broadband service offering is customized to meet the needs of the particular customer at the time service is initiated. Any changes to the service offering are a result of continuous and ongoing contact with the customers, and not from use of customers’ CPNI. (Should Centennial Business Solutions expand its business to include other categories of service, it will implement a system to clearly establish the status of a customer’s CPNI approval prior to any use of, disclosure of or permitting access to its customers’ CPNI.)

Second, Business Solutions does not disclose CPNI to, or permit access to CPNI, by third parties except as may be required by law (such as when CPNI is requested pursuant to a valid subpoena, court order, search warrant or national security letter), as is necessary for the provision of the broadband service itself, or in connection with the use of contract workers. In any case, any third parties to which CPNI is disclosed or who are

given access to CPNI are only given access to appropriate CPNI for the third party's purpose, and only after executing a confidentiality agreement or pursuant to the terms of a valid subpoena, court order, etc.

Third, Centennial Business Solutions employs a variety of operating procedures to ensure compliance with CPNI regulations. Such procedures include:

1. Centennial Business Solutions provides all employees with a copy of its corporate privacy policy, which is contained in a document entitled "Code of Conduct." The Code of Conduct instructs employees to not disclose any customer account information to anyone, except as authorized by law and to seek advice from the legal department if the employee has a question regarding the validity of a subpoena, court order, etc. to disclose customer information. Moreover, sales and customer service employees receive additional instruction on the proper handling of confidential customer information.
2. Centennial Business Solutions has a disciplinary program to ensure compliance with its operating procedures, including procedures for handling customer confidential information. Its disciplinary program includes a variety of penalties for the violation of privacy procedures, including the termination of employment where appropriate.
3. Centennial Business Solutions maintains records of those occasions where CPNI is released to third parties (such a release occurring pursuant to a valid subpoena), which are retained for at least one year.